

EXHIBIT 1



COPY

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November 1, 2011

GwanJun Kim
360 East Tuttle Road
Lot 54
Ionia, Michigan 48846

Re: **21-Day Safe Harbor Letter ~ Rule 11 Motion for Sanctions**

Dear Mr. Kim:

Pursuant to the requirements of Federal Rule of Civil Procedure 11(c)(2), the attached Motion for Sanctions and Brief in Support is being served on you by U.S. Mail in accordance with Rule 5 of the Federal Rules of Civil Procedure. If you do not voluntarily withdraw the following pleadings within twenty-one (21) days of the date of this letter, I will file the attached motion and brief seeking sanctions against you under Rule 11 and the Court's inherent authority with Court. The specific pleadings you must withdraw include:

1. **Dkt. Nos. 51, 52** → Application for entry of default as to all defendants and affidavit in support of same;
2. **Dkt. No. 60** → Motion for sanctions for violation or Rule 11(b);
3. **Dkt. Nos. 80, 81, 82** → Motion for default judgment as to all defendants and brief and affidavit in support of same;
4. **Dkt. Nos. 87, 88** → First motion to compel Rule 37 to require plaintiff's disclosure of expert's written reports and imposition of sanction [sic] and extend rebuttal reports dayes [sic] for plaintiff only and brief in support;
5. **Dkt. No. 91** → Notice of non-opposition of applicatin [sic] (motion) for entry of default and non-opposition of motion for default judgment;
6. **Dkt. Nos. 93, 94** → Motion to compel answers to plaintiff's first set of interrogatories and plaintiff's request for production of documents and brief in support;

WARNER NORCROSS & JUDD LLP

ATTORNEYS AT LAW

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7. **Dkt. Nos. 96, 97** → Motion for order document named as plaintiff's motion to determine the sufficiency of defendants' answers and/or deem defendants' answers admitted and brief in support; and
8. **Dkt. Nos. 107, 108** → Motion to supplement motion for default judgment and motion for sanctions and brief in support.

You must also withdraw all of the subpoenas you caused to be issued upon Grand Valley State University employees (both current and former) by the Clerk of the United States District Court for the Western District of Michigan on October 9, 2011.

Due to the results of our last telephone conversation, should you have any questions regarding the foregoing, or wish to agree to withdraw all of the foregoing pleadings and subpoenas, please contact me in writing rather than by telephone using the information above. E-mail will suffice.

Sincerely,



Gregory M. Kilby

GMK/dlh
Enc.
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